

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

'09 JAN 13 P 4:28

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. **09 CR-016**  
[T. 18 U.S.C. § 641]

JON R. CHILIPPO  
FBI

DENNIS CROUSE and  
SHARON SCHROEDER,

Defendants.

---

**INDICTMENT**

---

**THE GRAND JURY CHARGES:**

**Allegations Common to all Counts**

1. At all times material to this indictment, Dennis Crouse and Sharon Schroeder were the sole owners and operators of Total Life Healing Centers Fairhaven ("Total Life"), a community-based residential facility located at 2165 Fairhaven Boulevard, Elm Grove, Wisconsin.

2. In November 2006, Crouse and Schroeder submitted an application to the Social Security Administration (SSA) to have Total Life become the representative payee for Social Security benefits paid to B.W., who was then a resident at Total Life.

3. As a representative payee for B.W., Total Life was required to use any Social Security benefits received on behalf of B.W. solely for B.W.'s needs and to save any currently unneeded benefits for future use. Total Life was also required to notify the SSA when B.W. left the facility, otherwise changed her living arrangements, or was no longer the responsibility of the facility.

4. On November 21, 2007, the legal guardian for B.W. moved B.W. to a different facility. The defendants did not notify the SSA that B.W. had been transferred to another facility.

5. After B.W. had been moved to a different facility, the legal guardian for B.W. obtained summaries from Total Life purporting to account for all funds Total Life had received and spent on behalf of B.W. These summaries did not reflect or account for two payments Total Life received from the SSA on October 22, 2007 and December 4, 2007. These payments, which were in the amount of \$68,940 and \$96,310, respectively, represented Social Security benefits intended for B.W.

**COUNT ONE**

**THE GRAND JURY FURTHER CHARGES:**

6. On or about October 22, 2007, in the State and Eastern District of Wisconsin,

**DENNIS CROUSE and  
SHARON SCHROEDER**

wilfully and knowingly stole, purloined and converted to their own use and the use of another property belonging to the United States, namely \$68,940 representing Social Security benefits intended for B.W.

All in violation of Title 18, United States Code, Section 641.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES:**

7. On or about December 4, 2007, in the State and Eastern District of Wisconsin,

**DENNIS CROUSE and  
SHARON SCHROEDER**

wilfully and knowingly stole, purloined and converted to their own use and the use of another property belonging to the United States, namely \$96,310 representing Social Security benefits intended for B.W.

All in violation of Title 18, United States Code, Section 641.

A TRUE BILL:

  
FOREPERSON

Dated: 1/13/09



MICHELLE L. JACOBS  
Acting United States Attorney